

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

| | | |
|---------------------------------|---|------------------------------------|
| DYSON TECHNOLOGY LIMITED |) | |
| and DYSON, INC., |) | |
| |) | |
| Plaintiffs, |) | |
| v. |) | Civil Action No. 05-434-GMS |
| |) | |
| MAYTAG CORPORATION, |) | |
| |) | |
| Defendant. |) | |

**PLAINTIFF'S RULE 30(b)(6)
NOTICE OF DEPOSITION TO DEFENDANT**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6), plaintiffs will take the deposition upon oral examination of defendant Maytag Corporation through one or more of its officers, directors, managing agents, employees or other persons designated to testify on its behalf, with respect to each of the following subject matters set forth in "Attachment A" hereto.

The deposition will take place under oath and before a duly authorized notary public, or other person authorized by law to administer oaths. The deposition will be recorded by videographic and/or stenographic means. The deposition will take place at the offices of Young Conaway Stargatt & Taylor LLP, 1000 West Street, 17th Floor, Wilmington, Delaware, 19807, on March 20, 2007, at 9:00 a.m., or at such other date and time as the parties may mutually agree, and shall continue from day to day thereafter until concluded.

You are requested to produce the witnesses at the agreed time and indicated place and are invited to attend.

YOUNG CONAWAY STARGATT & TAYLOR, LLP



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Dated: March 14, 2007

ATTACHMENT A

DEFINITIONS

1. “Maytag” refers to the defendant and counterclaim plaintiff in this action, Maytag Corporation, and any entities directly or indirectly owned or controlled by Maytag.
2. The “Maytag Floor Care Business” means any floor care business operated by Maytag, including the Hoover floor care business and the Maytag Legacy.
3. “TTI” refers to Techtronic Industries Company, Limited and any entities directly or indirectly owned or controlled by Techtronic Industries Company, Limited.
4. The “Maytag-TTI Sale” means the sale by Maytag to Techtronic Industries Company, Limited of some or all of the Maytag Floor Care Business.

DEPOSITION TOPICS

1. Any and all changes in direct and indirect ownership of some or all of the Maytag Floor Care Business, including the assets and liabilities of such business, that occurred in the transactions that effectuated the Maytag-TTI Sale, including the ownership of the Maytag Floor Care Business before and after each step of such transactions.
2. The direct and indirect ownership of the floor care businesses owned by TTI after the Maytag-TTI Sale.
3. The contracts by which the changes described in item 1 were effectuated and terms of such contracts, including the consideration paid in the transactions described in item 1 and each step of such transactions.
4. The reasons for which TTI agreed to pay the values that it paid and assume the liabilities that it assumed in the Maytag-TTI Sale.
5. Any agreements between Maytag and TTI concerning the claims and counterclaims asserted in this litigation, including any discussions concerning such agreements.

6. The ability of the entities controlled by TTI that are proposed to be added/substituted as parties in this litigation to satisfy a judgment on the claims asserted against Maytag in this action.

CERTIFICATE OF SERVICE

I, Andrew A. Lundgren, hereby certify that on March 14, 2007, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

Francis DiGiovanni, Esquire
James D. Heisman, Esquire
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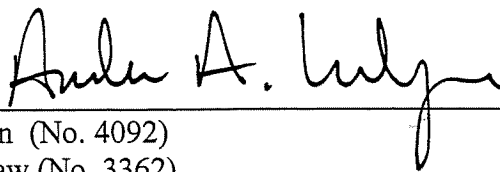
I further certify that on March 14, 2007, I caused a copy of the foregoing document to be served by hand delivery on the above-listed counsel of record and on the following in the manner indicated:

BY E-MAIL

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YOUNG CONAWAY STARGATT & TAYLOR, LLP

A handwritten signature in black ink, appearing to read "Andrew A. Lundgren", is written over a horizontal line.

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